

ARCADIS  
30 West Monroe, Suite 1710  
Chicago  
Illinois 60603  
Tel 312.332.4937  
Fax 312.332.4434  
www.arcadis-us.com

Mr. Sam Borries  
On-Scene Coordinator  
USEPA Region 5  
77 West Jackson Boulevard (SE-5J)  
Chicago, IL 60604-3590

SEDIMENTS

Subject:  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area Time-Critical Removal Action  
Monthly Report (January 2010)

Date:  
February 15, 2010

Dear Sam:

Contact:  
Steve Garbaciak

Attached is the 7<sup>th</sup> monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Paragraph 19a of the June 2009 Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action (Docket No. V-W-09-C-925). On August 5, 2009, the United States Environmental Protection Agency determined that future updates on the Former Plainwell Impoundment TCRA project will be included in this monthly report. Per the August 6, 2009 direction of the United States Environmental Protection Agency, monthly reports will only be submitted electronically.

Phone:  
312.332.4937 ext. 12

Email:  
steve.garbaciak@  
arcadis-us.com

If you have any questions, please do not hesitate to contact me.

Our ref:  
B0064536.0000.00014

Sincerely,



Stephen Garbaciak Jr., P.E.  
Vice President

Copies:  
Leslie Kirby-Miles, USEPA  
Richard Karl, USEPA  
James Saric, USEPA  
Paul Bucholtz, MDNRE  
Jeff Keiser, CH2M HILL  
Kathy Huibregtse, RMT Inc.

Richard Gay, Weyerhaeuser Company  
Martin Lebo, Weyerhaeuser Company  
J. Michael Davis, Esq., Georgia-Pacific LLC  
Paul Montney, P.E., Georgia-Pacific LLC  
Garry Griffith, P.E., Georgia-Pacific LLC  
Michael Erickson, P.E., ARCADIS

**MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/  
KALAMAZOO RIVER SUPERFUND SITE  
PLAINWELL NO. 2 DAM AREA TIME-CRITICAL REMOVAL ACTION**

**REPORT #7, JANUARY 2010**

**PREPARED BY ARCADIS  
FEBRUARY 15, 2010  
ON BEHALF OF GEORGIA-PACIFIC LLC**

**SUBMITTED TO**

**SAM BORRIES, ON-SCENE COORDINATOR  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #7, JANUARY 2010**

**Significant Developments and Activities During the Period**

- On January 5, ARCADIS submitted to Michigan Department of Environmental Quality (MDEQ) a summary of water treatment performed in 2009 to satisfy the requirement in Section C, Paragraph 3 of Substantive Requirements Document (SRD) MIU990028.
- On January 15, ARCADIS submitted to United States Environmental Protection Agency (USEPA) the 6<sup>th</sup> *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Plainwell No. 2 Dam Area TCRA* for December 2009.
- On January 28, ARCADIS submitted to Weston (subcontractor to USEPA) copies of chains-of-custody for samples collected at the Plainwell No. 2 Dam Area TCRA.
- On January 28, ARCADIS submitted a revised access agreement to the owner of the McMurtrie property (Mr. McMurtrie).
- The status of property access agreements is summarized in Table A. Access to the McMurtrie property is pending.

**Data Collected and Field Activities Conducted During the Period**

- No work activities were performed during the week of January 1.
- During the week of January 4, ARCADIS continued the removal of marketable timber cut from the north side of the river.
- During the week of January 11, ARCADIS completed the removal of marketable timber cut from the north side of the river and marked proposed access road and excavation area limits on the south side of the river. Four pre-construction soil samples (TS10053 through TS10056) were collected from 200-foot intervals along the access road along the river and the access road from Staging Area 1 to the Oxbow prior to construction. A five-part composite sample (TS10057) was collected from the four corners and center of Staging Area 1, prior to construction. All samples were submitted to KAR Laboratories, Inc. (KAR Labs) for polychlorinated biphenyl (PCB) analysis. Table B summarizes the samples collected.
- During the week of January 18, ARCADIS began removal of access roads on the north side of the river for re-use of aggregate material on the south side of the river, continued clearing and grubbing activities on the south side of the river, and continued installation of access roads on the south side of the river.
- During the week of January 25, ARCADIS continued removal of access roads on the north side of the river for re-use of aggregate material on the south side of the river, continued clearing and grubbing

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

**REPORT #7, JANUARY 2010**

activities on the south side of the river, and continued installation of access roads on the south side of the river. Nine pre-construction soil samples (TS10058 and TS10060 through TS10067) and one duplicate (TS10059) were collected from 200-foot intervals along the access road from Staging Area 1 to the Oxbow and from the access road from Douglas Avenue to Staging Area 2. All samples were submitted to KAR Labs for PCB analysis. Table B summarizes the samples collected.

**Laboratory Data Received During the Period**

- No analytical data were received during the weeks of January 1, 4, 18, or 25.
- During the week of January 11, ARCADIS received PCB analytical data for pre-construction soil samples TS10049 through TS10052 (collected in December) from TestAmerica Laboratories, Inc. (TAL).
- ARCADIS is awaiting analytical data for pre-construction soil samples TS10053 through TS10067.

**Issues Encountered and Actions Taken**

- Upon initial contact in 2009, the owner of the McMurtrie property (Mr. McMurtrie) stated that he would not sign the access agreement if the proposed location of Staging Area 2 was not moved away from his property line because he was concerned it will interfere with daily activities on his property (a horse training facility). The proposed location for Staging Area 2 is located on the Simons property adjacent to the McMurtrie property. As a part of the access agreement executed with the owners of the Simons property, the location of Staging Area 2 was moved away from the McMurtrie property. This modification to the location of Staging Area 2 alleviated Mr. McMurtrie's concern.

Mr. McMurtrie was also concerned that clearing of vegetation along the river would remove the tree line used as a natural boundary for his horse pen. On January 14, ARCADIS met with Mr. McMurtrie to discuss the location of construction activities and to state that, if necessary, ARCADIS would construct a barrier to replace the tree line as a boundary to his horse pen. After discussing the vegetative areas to be cleared, Mr. McMurtrie agreed that the boundary for his horse pen would not be compromised.

Mr. McMurtrie remained concerned that work activities performed near the river would interfere with his daily work activities to the extent that he may have to train his horses at an offsite location. ARCADIS informed Mr. McMurtrie that clearing and grubbing would be performed during the winter, when he is not actively training horses and that the anticipated length of excavation and restoration activities is only 2 to 3 weeks. ARCADIS and Georgia-Pacific agreed to reimburse Mr. McMurtrie if he was required to re-locate his horses during construction activities. A revised property access agreement including the reimbursement clause was submitted to Mr. McMurtrie on January 28. Georgia-Pacific and ARCADIS will continue to negotiate with Mr. McMurtrie throughout February.

**Monthly Report for the Allied Paper, Inc./Portage Creek/  
Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA**

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**Developments Anticipated During the Next Reporting Period**

- Throughout February, ARCADIS is tentatively scheduled to continue the removal of access roads on the north side of the river (for use in the construction of access roads on the south side of the river), continue the construction of Staging Area 1, being the construction of Staging Area 2, continue clearing and grubbing on the south side of the river, and continue installing access roads on the south side of the river.
- In February, ARCADIS will continue submitting copies of analytical data from Plainwell No. 2 Dam Area TCRA sampling activities to USEPA.
- In February, ARCADIS anticipates completing negotiations with the property owner (Mr. McMurtrie) for the remaining access agreement.

**Updates to the Former Plainwell Impoundment TCRA**

- On January 14, ARCADIS submitted to USEPA a response to the December 22 USEPA letter of final comments on the Construction Completion Report (CCR) and a revised CCR.
- On January 22, Michigan Department of Natural Resources and Environment (MDNRE, formerly known as MDEQ and Michigan Department of Natural Resources) submitted to ARCADIS a reimbursement request for response activity and oversight expenses associated with the Former Plainwell Impoundment TCRA. ARCADIS received the request and associated backup on January 29. This request is discussed in Section XV of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action.
- On January 28, ARCADIS submitted to Weston (USEPA subcontractor) a copy of the chain-of-custody for surface water samples TS30003-TS30006, collected in April 2008.
- On January 29, ARCADIS submitted to MDNRE a letter and supporting materials documenting the surface water PCB data collected during the former Plainwell Impoundment TCRA.

**Developments Anticipated During the Next Reporting Period from the Former Plainwell Impoundment TCRA**

- ARCADIS awaits approval of its response to USEPA's final comments on the CCR and of the revised CCR, both submitted to USEPA in January 2010.

Georgia-Pacific, LLC  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Plainwell No. 2 Dam Area TCRA  
Monthly Report #7, January 2010

**Table A — Summary of Property Access Agreements (as of January 31, 2010)**

Date Sent	Property Owner	Parcel Number	Status
6/10/2009, revised 11/18/09	Arcan Inc. (Farrell)	08-032-010-00	accepted (original received 6/18/09, revised received 11/19/09)
5/22/2009	Consumers Energy	08-032-015-00	accepted (received 10/07/09)
7/31/2009	Diana Steele Thompson	08-032-005-10	accepted (received 8/4/09)
5/22/2009	Edward and Ronald Hodgman	08-032-027-00	accepted (received 6/3/09)
5/22/2009, revised 12/29/09 and 01/28/10	Edward Mc Murtrie	08-032-042-00 08-032-044-00	in negotiations
5/22/2009	Howe Aluminum Products	08-032-028-00	accepted (received 6/3/09)
7/31/2009	MDNR	08-032-041-00 08-032-040-00	accepted (received 8/7/09)
5/22/2009, revised 11/20/09, 12/04/09, and 12/22/09	Michelle and Paul Simons	08-032-034-10 08-032-039-00 08-032-006-00	accepted (received 12/22/09)
7/29/2009	Steele Trust	08-033-012-00 08-033-009-00 08-033-018-00	accepted (received 8/3/09)
8/4/2009	Ray Hendricksma	08-032-033-00	accepted (received 8/7/09)
	Terry Winkle		accepted (received 8/10/09)

**Georgia-Pacific LLC**  
**Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site**  
**Plainwell No. 2 Dam Area TCRA**  
**Monthly Report #7, January 2010**

**Table B — Summary of Samples Collected and Data Received in January 2010**

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action / Notes
<b>Property Access Soil Samples</b>									
TS10049	12/03/09	01/12/10	KAL505	TAL	Access road on Farrell property (Douglas Avenue to SA1 to River)	PCBs	0.063 mg/kg U	-	None
TS10050					Access road on Farrell property (Douglas Avenue to SA1 to River)	PCBs	0.066 mg/kg U	-	None
TS10051					Access road on Farrell property (Douglas Avenue to SA1 to River)	PCBs	0.080 mg/kg U	-	None
TS10052					Access road on Farrell property (Douglas Avenue to SA1 to River)	PCBs	0.077 mg/kg U	-	None
TS10053	01/12/10	NR	NR	KAR Labs	Access road on Farrell property along River	PCBs	-	-	-
TS10054					Access road on Farrell property along River	PCBs	-	-	-
TS10055					Access road on Farrell property along River	PCBs	-	-	-
TS10056					Access road on Consumers property from SA1 to Oxbow	PCBs	-	-	-
TS10057					5- part composite sample collected from SA1	PCBs	-	-	-
TS10058	01/27/10	NR	NR	KAR Labs	Access road on Simons property from SA1 to Oxbow	PCBs	-	-	-
[TS10059]					Access road on Simons property from SA1 to Oxbow	[PCBs]	[-]	[-]	[-]
TS10060					Access road on Simons property from SA1 to Oxbow	PCBs	-	-	-
TS10061					Access road on Simons property from SA1 to Oxbow	PCBs	-	-	-
TS10062					Access road on Simons property from SA1 to Oxbow	PCBs	-	-	-
TS10063					Access road on Simons property from SA1 to Oxbow	PCBs	-	-	-
TS10064					Access road on Simons property from SA1 to Oxbow	PCBs	-	-	-
TS10065	01/29/10	NR	NR	KAR Labs	Access road on Simons property from SA1 to Oxbow	PCBs	-	-	-
TS10066					Access road on Simons property from Douglas Avenue to SA2	PCBs	-	-	-
TS10067					Access road on Simons property from Douglas Avenue to SA2	PCBs	-	-	-

**Notes:**

\* Duplicate samples shown in brackets

\* Analytical results have not been validated.

mg/kg - milligrams per kilogram

NR - Not Received

PCBs - polychlorinated biphenyls

SA - Staging Area

TAL - TestAmerica Laboratories

U - Compound analyzed but not detected at a concentration above the reporting limit